

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

JEFFREY AND AMY MANSFIELD

(b) County of Residence of First Listed Plaintiff _____

(c) Attorney's (Firm Name, Address, Telephone Number and Email Address)

Craig Thor Kimmel, Esquire
Kimmel & Silverman, P.C.
30 E. Butler Pike
Ambler, PA 19002
(215) 540-8888

DEFENDANTS

REDLINE RECOVERY SERVICES, LLC

County of Residence of First Listed Defendant _____

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

Attorneys (If Known) _____

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 2 U.S. Government Defendant
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify) _____
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
 15 U.S.C. Section 1692

Brief description of cause:
 Fair Debt Collection Practices Act

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ _____

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S)**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

Explanation:

4/21/2010

DATE

SIGNATURE OF ATTORNEY OF RECORD

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 234 Marshall Street, Perkasie, PA 18944
 Address of Defendant: 95 John Muir Drive, Amherst, New York 14228
 Place of Accident, Incident or Transaction: 234 Marshall Street, Perkasie, PA 18944
 (Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
 (Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
 Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
 Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
 Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
 Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FEELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases 15 U.S.C §1692
 (Please specify)

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases
 (Please specify)

ARBITRATION CERTIFICATION

I, Craig Thor Kimmel, (Check Appropriate Category)
 counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: 4/21/2010 Craig Thor Kimmel 57100
 Attorney-at-Law Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 4/21/2010 Craig Thor Kimmel 57100
 Attorney-at-Law Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

Jeffrey and Amy Mansfield : CIVIL ACTION
v. :
Redline Recovery Services, LLC : NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ☒

<u>4/21/2010</u>	<u>Craig Thur Kimmel</u>	<u>Jeffrey and Amy Mansfield</u>
Date	Attorney-at-law	Attorney for
<u>(215) 540-8888</u>	<u>(215) 540-8817</u>	<u>kimmel@creditlaw.com</u>
Telephone	FAX Number	E-Mail Address

1 **sUNITED STATES DISTRICT COURT**
2 **FOR THE**
3 **EASTERN DISTRICT OF PENNSYLVANIA**

4 **JEFFREY AND AMY MANSFIELD,**)

5 Plaintiff,)

6 v.)

7 **REDLINE RECOVERY SERVICES, LLC**)

8 Defendant.)

Civil Action No.:

COMPLAINT AND DEMAND FOR JURY
TRIAL

(Unlawful Debt Collection Practices)

11 **COMPLAINT**

12 JEFFREY AND AMY MANSFIELD (“Plaintiffs”), by their attorneys, KIMMEL &
13 SILVERMAN, P.C., alleges the following against REDLINE RECOVERY SERVICES, LLC:
14

15 **INTRODUCTION**

16 1. Plaintiffs’ Complaint is based on the Fair Debt Collection Practices Act, 15
17 U.S.C. § 1692 *et seq.* (“FDCPA”).
18

19 **JURISDICTION AND VENUE**

20 2. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d), which states
21 that such actions may be brought and heard before “any appropriate United States district court
22 without regard to the amount in controversy,” and 28 U.S.C. § 1367 grants this court
23 supplemental jurisdiction over the state claims contained therein.

24 3. Defendant conducts business in the Commonwealth of Pennsylvania and
25 therefore, personal jurisdiction is established.

4. Venue is proper pursuant to 28 U.S.C. § 1391(b)(1).

5. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and 2202.

PARTIES

6. Plaintiffs are natural persons residing in Perkasié, Pennsylvania.

7. Plaintiffs are both a “consumer” as that term is defined by 15 U.S.C. § 1692a(3).

8. Defendant, REDLINE RECOVERY SERVICES LLC, is company handling debt collection matters with headquarters located at 95 John Muir Drive, Amherst, New York, 14228.

9. Defendant is a debt collector as that term is defined by 15 U.S.C. §1692a(6), and sought to collect a consumer debt from Plaintiffs.

10. Defendant acted through their agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

FACTUAL ALLEGATIONS

11. Beginning in or around September or October 2009, Defendant began to repeatedly call the Plaintiff at home and at work regarding an alleged debt owed to FIA Card Services, N.A.

12. Telephone calls were placed in excess of two times a day, ten times a week, and twenty times in a given month. See a phone log generated from Plaintiff’s telephone records attached hereto as Exhibit “A”.

13. On some days Defendant called Plaintiff in excess of five times. See Exhibit “A”.

14. Telephone calls were also placed during weekends and at places known to be inconvenient to the Plaintiffs, including Plaintiffs’ places of employment and to telephone numbers of family members, who are not alleged debtors. See Exhibit “A”.

1 15. Defendant's representatives were rude to co-workers and family members of
2 Plaintiffs, and disclosed personal information without the prior approval of Plaintiffs.

3 16. During these conversations Defendant threatened to garnish Plaintiffs' wages,
4 seize their property and/or "freeze assets" if payment was not made.

5 17. As there was no valid judgment in this matter, these actions could not be taken.

6 18. Defendant also sent written correspondence to Plaintiffs.

7 19. In or around October 6, 2009, Defendant caused a letter to be sent to Plaintiffs
8 residence. A true and correct copy of Defendant's letter dated October 6, 2009 is attached
9 hereto as Exhibit "B".

10 20. This introductory language of this letter overshadows the rights that are required
11 to be set forth in such correspondence, specifically Plaintiffs right to dispute the validity of the
12 debt and/or to seek verification of the debt. See Exhibit "B".

13 21. The introductory language of the letter addresses actions which Defendant may
14 take against Plaintiff if not paid, i.e. "forwarding your account to [FIA Card Service N.A.'s]
15 lawyers to review for potential litigation or arbitration[.]". See Exhibit "B".

16 22. Plaintiffs disputed the amount of the debt owed, however feeling they had no
17 choice and worrying about a garnishment and/or seizure of their property, Plaintiffs entered into
18 a payment plan with Defendant via telephone.

19 23. Under the terms of the payment plan Plaintiffs agreed to pay \$8,600.00 of the
20 alleged \$14,325.35 debt owed over the course of four months and Defendants agreed to waive
21 the alleged balance owed.

22 24. Plaintiffs commenced making payments during that time period.

23 25. Defendant sent Plaintiffs a second letter on October 26, 2009. A true and correct
24 copy of the October 26, 2009 letter is attached hereto as Exhibit "C".
25

1
2 26. This letter sets forth the payment plan agreed to between the parties, but fails to
3 advise the Plaintiffs of any rights they may have. See Exhibit "C".

4 27. On or about October 31, 2009, Plaintiffs sent a first payment to Defendant in the
5 amount of \$2,158.00.

6 28. On or about November 30, 2009, Plaintiffs sent a second payment to Defendant
7 in the amount of \$2,200.00.

8 29. However, Defendants reneged on the deal before the four month period was
9 complete and advised Plaintiffs the full balance was due and owing and the agreement was
10 "void".

11 30. Defendant's representatives also advised Plaintiffs that if they failed to pay the
12 full balance the portions that were paid, approximately \$4,300.00, would be "out the window."

13 31. During this time period, Defendants repeat telephone calls continued.

14 32. On or about January 8, 2010 Plaintiffs sent to Defendant a letter advising it that
15 Plaintiffs considered their frequent calls abusive and harassing and requested that Defendant
16 cease all further communications with Plaintiffs. A true and correct copy of Plaintiffs' January
17 8, 2010 letter is attached hereto as Exhibit "D".

18 33. Despite this request, the repeated and harassing telephone calls continued.
19

20 **CONSTRUCTION OF APPLICABLE LAW**

21 34. The FDCPA is a strict liability statute. Taylor v. Perrin, Landry, deLaunay &
22 Durand, 103 F.3d 1232 (5th Cir. 1997). "Because the Act imposes strict liability, a consumer
23 need not show intentional conduct by the debt collector to be entitled to damages." Russell v.
24 Equifax A.R.S., 74 F. 3d 30 (2d Cir. 1996); see also Gearing v. Check Brokerage Corp., 233
25

1 F.3d 469 (7th Cir. 2000) (holding unintentional misrepresentation of debt collector's legal status
2 violated FDCPA); Clomon v. Jackson, 988 F. 2d 1314 (2d Cir. 1993).

3 35. The FDCPA is a remedial statute, and therefore must be construed liberally in
4 favor of the debtor. Sprinkle v. SB&C Ltd., 472 F. Supp. 2d 1235 (W.D. Wash. 2006). The
5 remedial nature of the FDCPA requires that courts interpret it liberally. Clark v. Capital Credit
6 & Collection Services, Inc., 460 F. 3d 1162 (9th Cir. 2006). "Because the FDCPA, like the
7 Truth in Lending Act (TILA) 15 U.S.C §1601 *et seq.*, is a remedial statute, it should be
8 construed liberally in favor of the consumer." Johnson v. Riddle, 305 F. 3d 1107 (10th Cir.
9 2002).

10 36. The FDCPA is to be interpreted in accordance with the "least sophisticated"
11 consumer standard. See Jeter v. Credit Bureau, Inc., 760 F.2d 1168 (11th Cir. 1985); Graziano
12 v. Harrison, 950 F. 2d 107 (3rd Cir. 1991); Swanson v. Southern Oregon Credit Service, Inc.,
13 869 F.2d 1222 (9th Cir. 1988). The FDCPA was not "made for the protection of experts, but for
14 the public - that vast multitude which includes the ignorant, the unthinking, and the credulous,
15 and the fact that a false statement may be obviously false to those who are trained and
16 experienced does not change its character, nor take away its power to deceive others less
17 experienced." Id. The least sophisticated consumer standard serves a dual purpose in that it
18 ensures protection of all consumers, even naive and trusting, against deceptive collection
19 practices, and protects collectors against liability for bizarre or idiosyncratic interpretations of
20 collection notices. Clomon, 988 F. 2d at 1318.

21
22 **COUNT I**
23 **DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT**

24 37. In its actions to collect a disputed debt, Defendant violated the FDCPA in one or
25 more of the following ways:

- a. Communicating with Plaintiffs places known to be inconvenient to Plaintiff, specifically repeatedly contacting Plaintiffs at their places of employment and telephone numbers for family members, in violation of 15 U.S.C. § 1692c(a)(1).
- b. Communicating with third parties without prior consent of the consumer, in violation of 15 U.S.C. § 1692c(a)(4).
- c. Failing to cease communications upon request, in violation of 15 U.S.C. § 1692c(a)(5).
- d. Harassing, oppressing or abusing Plaintiffs in connection with the collection of a debt, in violation of 15 U.S.C. § 1692d.
- e. Causing Plaintiffs' telephone to ring repeatedly or continuously with intent to annoy, abuse, or harass him, in violation of 15 U.S.C. § 1692d(5).
- f. Misrepresenting the amount of the debt and failing to provide an explanation as to how the debt increased, in violation of 15 U.S.C. § 1692e(2).
- g. Threatening to seize Plaintiffs' property, in violation of 15 U.S.C. § 1692e(4).
- h. Threatening to garnish Plaintiffs' wages, in violation of 15 U.S.C. § 1692e(4).
- i. Threatening to take actions which can not legally be taken, in violation of 15 U.S.C. § 1692e(5).
- j. Using other false or deceptive means to collect a debt, in violation of 15 U.S.C. § 1692c(a)(10).

- k. Using unfair or unconscionable means to collect or attempt to collect any debt, in violation of 15 U.S.C. §1692f.
- l. The collection of additional amounts not expressly authorized, in violation of 15 U.S.C. §1692f(1).
- m. By acting in an otherwise deceptive, unfair and unconscionable manner and failing to comply with the FDCPA.

WHEREFORE, Plaintiffs, JEFFREY AND AMY MANSFIELD, respectfully prays for a judgment as follows:

- a. All actual compensatory damages suffered pursuant to 15 U.S.C. § 1692k(a)(1);
- b. Statutory damages of \$1,000.00 for each violation of the FDCPA pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c. All reasonable attorneys' fees, witness fees, court costs and other litigation costs incurred by Plaintiff pursuant to 15 U.S.C. § 1693k(a)(3); and
- d. Any other relief deemed appropriate by this Honorable Court.

DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that Plaintiffs, JEFFREY AND AMY MANSFIELD, demand
a jury trial in this case.

RESPECTFULLY SUBMITTED,

DATED: April 21, 2010

KIMMEL & SILVERMAN, P.C..

By: /s/ Craig Thor Kimmel
Craig Thor Kimmel
Attorney ID # 57100
Kimmel & Silverman, P.C.
30 E. Butler Pike
Ambler, PA 19002
Phone: (215) 540-8888
Fax: (215) 540-8817
Email: kimmel@creditlaw.com

© Digital Voice Center

print view

Subscriber: Jeff Mansfield

Printed: Thu Jan 21, 2010 4:00 PM

Received Calls for:

View by: Received Calls Dates: December 22, 2009 to January 21, 2010

TYPE	FROM	DATE
Answered 1:00	NET NET SRVC (716) 250-4800	Thu 1/21/10 10:43 AM
Missed		Wed 1/20/10 8:57 PM
Missed		Wed 1/20/10 8:57 PM
Missed	Unknown	Wed 1/20/10 6:30 PM
Missed		Wed 1/20/10 6:30 PM
Answered 3:00	Unknown	Wed 1/20/10 5:30 PM
Answered 3:00		Wed 1/20/10 5:30 PM
Answered 2:00	Unknown	Wed 1/20/10 4:02 PM
Answered 2:00		Wed 1/20/10 4:02 PM
Answered 1:00		Wed 1/20/10 3:18 PM
Answered 1:00		Wed 1/20/10 3:18 PM
Answered 2:00	Unknown	Wed 1/20/10 2:33 PM
Answered 2:00		Wed 1/20/10 2:33 PM
Answered 1:00	Unknown	Wed 1/20/10 2:18 PM
Answered 1:00		Wed 1/20/10 2:18 PM
Answered 2:00		Wed 1/20/10 1:24 PM
Answered 2:00	Unknown	Wed 1/20/10 1:24 PM
Answered 3:00		Wed 1/20/10 12:38 PM
Answered 3:00	Unknown	Wed 1/20/10 12:38 PM
Answered 5:00		Wed 1/20/10 10:51 AM
Answered 5:00	Unknown	Wed 1/20/10 10:51 AM
Answered 2:00		Wed 1/20/10 9:20 AM
Answered 2:00	Unknown	Wed 1/20/10 9:20 AM
Answered 1:00		Wed 1/20/10 9:03 AM
Answered 1:00	Unknown	Wed 1/20/10 9:03 AM
Answered 2:00		Wed 1/20/10 7:41 AM
Answered 2:00	Unknown	Wed 1/20/10 7:41 AM

ALL-STATE LEGAL

PLAINTIFF'S
EXHIBIT

A

Answered 3:00	Unknown	Wed 1/20/10	6:23 AM
Answered 3:00		Wed 1/20/10	6:23 AM
Answered 1:00		Tue 1/19/10	8:14 PM
Answered 1:00		Tue 1/19/10	8:14 PM
Answered 1:00		Tue 1/19/10	2:16 PM
Answered 1:00		Tue 1/19/10	2:16 PM
Answered 1:00	Unknown	Tue 1/19/10	11:55 AM
Answered 1:00	NET NET SRVC (716) 250-4800	Tue 1/19/10	11:55 AM
Answered 1:00		Tue 1/19/10	10:30 AM
Answered 1:00		Tue 1/19/10	10:30 AM
Answered 2:00		Tue 1/19/10	8:09 AM
Answered 2:00	Unknown	Tue 1/19/10	8:09 AM
Answered 1:00	Unknown	Tue 1/19/10	7:28 AM
Answered 1:00		Tue 1/19/10	7:28 AM
Answered 1:00	Unknown	Mon 1/18/10	6:08 PM
Answered 1:00		Mon 1/18/10	6:08 PM
Missed		Mon 1/18/10	2:34 PM
Missed	Unknown	Mon 1/18/10	2:34 PM
Missed	Unknown	Mon 1/18/10	10:34 AM
Missed		Mon 1/18/10	10:34 AM
Answered 1:00		Mon 1/18/10	10:23 AM
Answered 1:00		Mon 1/18/10	10:23 AM
Answered 1:00		Mon 1/18/10	8:23 AM
Answered 1:00	Unknown	Mon 1/18/10	8:23 AM
Answered 1:00		Mon 1/18/10	7:25 AM
Answered 1:00	Unknown	Mon 1/18/10	7:25 AM
Answered 5:00		Sun 1/17/10	8:40 PM
Answered 5:00	Unknown	Sun 1/17/10	8:40 PM
Answered 1:00		Sun 1/17/10	7:19 PM
Answered 1:00	Unknown	Sun 1/17/10	7:19 PM
Answered 1:00	Unknown	Sun 1/17/10	6:14 PM
Answered 1:00		Sun 1/17/10	6:14 PM
Answered 26:00		Sun 1/17/10	3:19 PM
Answered 26:00	Unknown	Sun 1/17/10	3:19 PM
Answered 5:00	Unknown	Sun 1/17/10	1:04 PM
Answered 5:00		Sun 1/17/10	1:04 PM
Answered 1:00		Sun 1/17/10	11:10 AM
Answered 1:00	Unknown	Sun 1/17/10	11:10 AM

Answered 1:00	Unknown		Sat 1/16/10	7:43 PM
Answered 1:00			Sat 1/16/10	7:43 PM
Answered 1:00	Unknown		Sat 1/16/10	4:39 PM
Answered 1:00			Sat 1/16/10	4:39 PM
Missed			Sat 1/16/10	9:21 AM
Missed	Unknown		Sat 1/16/10	9:21 AM
Answered 1:00	Unavailable		Sat 1/16/10	8:50 AM
Answered 1:00	Unknown		Sat 1/16/10	8:50 AM
Answered 3:00	Unknown		Sat 1/16/10	7:10 AM
Answered 3:00			Sat 1/16/10	7:10 AM
Answered 70:00	Unknown		Fri 1/15/10	10:59 PM
Answered 70:00			Fri 1/15/10	10:59 PM
Missed	Unknown		Fri 1/15/10	9:25 PM
Answered 1:00			Fri 1/15/10	9:25 PM
Answered 1:00			Fri 1/15/10	7:23 PM
Answered 1:00	Unknown		Fri 1/15/10	7:23 PM
Answered 1:00			Fri 1/15/10	7:22 PM
Answered 1:00	Unknown		Fri 1/15/10	7:22 PM
Answered 4:00	Unknown		Fri 1/15/10	7:10 PM
Answered 4:00			Fri 1/15/10	7:10 PM
Answered 1:00			Fri 1/15/10	6:47 PM
Answered 1:00	Unknown		Fri 1/15/10	6:47 PM
Answered 1:00	Unknown		Fri 1/15/10	6:27 PM
Answered 1:00	Unavailable		Fri 1/15/10	6:27 PM
Answered 1:00			Fri 1/15/10	5:52 PM
Answered 1:00	Unknown		Fri 1/15/10	5:52 PM
Answered 1:00	Unknown		Fri 1/15/10	5:50 PM
Answered 1:00			Fri 1/15/10	5:50 PM
Answered 1:00	Unknown		Fri 1/15/10	4:46 PM
Answered 1:00	Unavailable		Fri 1/15/10	4:46 PM
Answered 1:00	Unknown		Fri 1/15/10	3:03 PM
Answered 1:00	NET NET SRVC	(716) 250-4800	Fri 1/15/10	3:03 PM
Answered 1:00		7	Fri 1/15/10	9:33 AM
Answered 1:00	Unknown		Fri 1/15/10	9:33 AM
Answered 1:00	Unknown		Fri 1/15/10	8:23 AM
Answered 1:00	NET NET SRVC	(716) 250-4800	Fri 1/15/10	8:23 AM
Answered 1:00	Unknown		Fri 1/15/10	8:17 AM
Answered 1:00			Fri 1/15/10	8:17 AM

Answered	3:00					Fri 1/15/10	7:43 AM
Answered	3:00	Unknown				Fri 1/15/10	7:43 AM
Answered	1:00	Unknown				Thu 1/14/10	4:11 PM
Answered	1:00	Unavailable				Thu 1/14/10	4:11 PM
Answered	1:00	Unknown				Thu 1/14/10	4:08 PM
Answered	1:00	Unavailable				Thu 1/14/10	4:08 PM
Answered	1:00	NET NET SRVC	(716) 250-4800			Thu 1/14/10	2:33 PM
Answered	1:00	Unknown				Thu 1/14/10	2:33 PM
Answered	1:00	NET NET SRVC	(716) 250-4800			Thu 1/14/10	2:30 PM
Answered	1:00	Unknown				Thu 1/14/10	2:30 PM
Answered	1:00	Unknown				Thu 1/14/10	9:44 AM
Answered	1:00	Unavailable				Thu 1/14/10	9:44 AM
Answered	1:00	Unknown				Thu 1/14/10	8:20 AM
Answered	1:00					Thu 1/14/10	8:20 AM
Answered	3:00	Unknown				Thu 1/14/10	7:55 AM
Answered	3:00					Thu 1/14/10	7:55 AM
Answered	14:00	Unknown				Wed 1/13/10	8:10 PM
Answered	14:00					Wed 1/13/10	8:10 PM
Answered	1:00					Wed 1/13/10	7:14 PM
Answered	1:00	Unknown				Wed 1/13/10	7:14 PM
Answered	1:00					Wed 1/13/10	6:35 PM
Answered	1:00	Unknown				Wed 1/13/10	6:35 PM
Answered	1:00	Unknown				Wed 1/13/10	4:27 PM
Answered	1:00	NET NET SRVC	(716) 250-4800			Wed 1/13/10	4:27 PM
Answered	1:00	Unknown				Wed 1/13/10	2:36 PM
Answered	1:00	Unavailable				Wed 1/13/10	2:36 PM
Answered	1:00	Unknown				Wed 1/13/10	12:06 PM
Answered	1:00					Wed 1/13/10	12:06 PM
Answered	1:00	Unknown				Wed 1/13/10	10:21 AM
Answered	1:00	Unavailable				Wed 1/13/10	10:21 AM
Answered	1:00					Wed 1/13/10	8:56 AM
Answered	1:00	Unknown				Wed 1/13/10	8:56 AM
Answered	1:00	NET NET SRVC	(716) 250-4800			Wed 1/13/10	8:53 AM
Answered	1:00	Unknown				Wed 1/13/10	8:53 AM
Missed						Wed 1/13/10	8:38 AM
Missed		Unknown				Wed 1/13/10	8:38 AM
Answered	2:00				3	Wed 1/13/10	7:42 AM
Answered	2:00	Unknown				Wed 1/13/10	7:42 AM

Missed		Unknown				Tue 1/12/10	7:39 AM
Missed						Tue 1/12/10	7:39 AM
Missed		Unknown				Tue 1/12/10	7:02 AM
Missed				4		Tue 1/12/10	7:02 AM
Answered	13:00					Mon 1/11/10	9:03 PM
Answered	13:00	Unknown				Mon 1/11/10	9:03 PM
Answered	2:00					Mon 1/11/10	8:36 PM
Answered	2:00	Unknown				Mon 1/11/10	8:36 PM
Answered	1:00	NET NET SRVC	(716) 250-4800			Mon 1/11/10	7:49 PM
Answered	1:00	Unknown				Mon 1/11/10	7:49 PM
Answered	9:00	Unknown				Mon 1/11/10	7:17 PM
Answered	9:00					Mon 1/11/10	7:17 PM
Answered	1:00	Unknown				Mon 1/11/10	5:44 PM
Answered	1:00					Mon 1/11/10	5:44 PM
Answered	0:00	Un	in			Mon 1/11/10	1:21 PM
Answered	0:00					Mon 1/11/10	1:21 PM
Answered	1:00					Mon 1/11/10	10:39 AM
Answered	1:00					Mon 1/11/10	10:39 AM
Answered	1:00					Mon 1/11/10	8:05 AM
Answered	1:00	Unknown				Mon 1/11/10	8:05 AM
Answered	1:00	Unknown				Sun 1/10/10	8:41 PM
Answered	1:00					Sun 1/10/10	8:41 PM
Answered	1:00	Unknown				Sun 1/10/10	6:53 PM
Answered	1:00					Sun 1/10/10	6:53 PM
Answered	1:00	Unknown				Sun 1/10/10	6:08 PM
Answered	1:00					Sun 1/10/10	6:08 PM
Answered	1:00					Sun 1/10/10	3:14 PM
Answered	1:00	Unknown				Sun 1/10/10	3:14 PM
Answered	6:00					Sun 1/10/10	2:42 PM
Answered	6:00	Unknown				Sun 1/10/10	2:42 PM
Answered	3:00	Unknown				Sun 1/10/10	1:34 PM
Answered	3:00					Sun 1/10/10	1:34 PM
Answered	1:00					Sun 1/10/10	11:17 AM
Answered	1:00	Unknown				Sun 1/10/10	11:17 AM
Answered	2:00	Unknown				Sat 1/9/10	9:50 PM
Answered	2:00					Sat 1/9/10	9:50 PM
Answered	11:00					Sat 1/9/10	5:09 PM
Answered	11:00	Unknown				Sat 1/9/10	5:09 PM

Answered 1:00			Sat 1/9/10	4:47 PM
Answered 1:00	Unknown		Sat 1/9/10	4:47 PM
Answered 1:00			Sat 1/9/10	11:23 AM
Answered 1:00	Unknown		Sat 1/9/10	11:23 AM
Answered 1:00	NET NET SRVC	(716) 250-4800	Sat 1/9/10	10:12 AM
Answered 1:00	Unknown		Sat 1/9/10	10:12 AM
Missed		Unknown	Sat 1/9/10	10:00 AM
Answered 1:00			Sat 1/9/10	10:00 AM
Missed			Fri 1/8/10	10:02 PM
Missed	Unknown		Fri 1/8/10	10:02 PM
Answered 1:00			Fri 1/8/10	8:54 PM
Answered 1:00		Unknown	Fri 1/8/10	8:54 PM
Answered 1:00	Unknown		Fri 1/8/10	8:30 PM
Answered 1:00			Fri 1/8/10	8:30 PM
Answered 1:00			Fri 1/8/10	6:36 PM
Answered 1:00			Fri 1/8/10	6:36 PM
Answered 1:00			Fri 1/8/10	5:21 PM
Answered 1:00	Unknown		Fri 1/8/10	5:21 PM
Answered 1:00		Unknown	Fri 1/8/10	4:13 PM
Answered 1:00			Fri 1/8/10	4:13 PM
Answered 1:00	Unknown		Fri 1/8/10	3:22 PM
Answered 1:00			Fri 1/8/10	3:22 PM
Answered 1:00	Unknown		Fri 1/8/10	11:16 AM
Answered 1:00			Fri 1/8/10	11:16 AM
Answered 1:00	Unknown		Fri 1/8/10	11:06 AM
Answered 1:00			Fri 1/8/10	11:06 AM
Answered 4:00			Fri 1/8/10	11:01 AM
Answered 4:00	Unknown		Fri 1/8/10	11:01 AM
Answered 2:00	Unknown		Fri 1/8/10	10:04 AM
Answered 2:00			Fri 1/8/10	10:04 AM
Answered 1:00		Unknown	Fri 1/8/10	8:59 AM
Answered 1:00			Fri 1/8/10	8:59 AM
Answered 1:00	Unknown		Fri 1/8/10	8:30 AM
Answered 1:00			Fri 1/8/10	8:30 AM
Answered 1:00	Unknown		Fri 1/8/10	8:24 AM
Answered 1:00	NET NET SRVC	(716) 250-4800	Fri 1/8/10	8:24 AM
Answered 2:00	Unknown		Fri 1/8/10	7:54 AM
Answered 2:00			Fri 1/8/10	7:54 AM

Answered 1:00				Fri 1/8/10	7:52 AM
Answered 1:00	Unknown			Fri 1/8/10	7:52 AM
Answered 1:00				Fri 1/8/10	5:30 AM
Answered 1:00	Unknown			Fri 1/8/10	5:30 AM
Answered 1:00	Unknown			Thu 1/7/10	8:09 PM
Answered 1:00			3	Thu 1/7/10	8:09 PM
Answered 2:00	Unknown			Thu 1/7/10	6:51 PM
Answered 2:00				Thu 1/7/10	6:51 PM
Missed	Unknown			Thu 1/7/10	3:45 PM
Missed				Thu 1/7/10	3:45 PM
Answered 1:00	NET NET SRVC	(716) 250-4800		Thu 1/7/10	3:11 PM
Answered 1:00	Unknown			Thu 1/7/10	3:11 PM
Answered 1:00	Unknown			Thu 1/7/10	1:00 PM
Answered 1:00	NET NET SRVC	(716) 250-4800		Thu 1/7/10	1:00 PM
Answered 1:00	Unknown			Thu 1/7/10	11:05 AM
Answered 1:00				Thu 1/7/10	11:05 AM
Answered 1:00				Thu 1/7/10	8:27 AM
Answered 1:00	Unknown			Thu 1/7/10	8:27 AM
Answered 1:00	NET NET SRVC	(716) 250-4800		Thu 1/7/10	8:20 AM
Answered 1:00	Unknown			Thu 1/7/10	8:20 AM
Answered 1:00				Thu 1/7/10	8:19 AM
Answered 1:00	Unknown			Thu 1/7/10	8:19 AM
Missed	Unknown			Thu 1/7/10	8:19 AM
Answered 1:00	Unknown	(716) 250-4800		Thu 1/7/10	8:19 AM
Answered 1:00	Unknown			Thu 1/7/10	8:01 AM
Answered 1:00				Thu 1/7/10	8:01 AM
Answered 1:00	Unknown			Wed 1/6/10	9:07 PM
Answered 1:00				Wed 1/6/10	9:07 PM
Answered 1:00	Unknown			Wed 1/6/10	7:29 PM
Answered 1:00				Wed 1/6/10	6:27 PM
Answered 1:00	Unknown			Wed 1/6/10	6:27 PM
Answered 1:00				Wed 1/6/10	3:06 PM
Answered 1:00	Unknown			Wed 1/6/10	3:06 PM
Answered 1:00	NET NET SRVC	(716) 250-4800		Wed 1/6/10	11:02 AM
Answered 3:00			1	Wed 1/6/10	9:12 AM
Answered 1:00			3	Wed 1/6/10	8:08 AM
Answered 3:00				Wed 1/6/10	8:05 AM
Answered 2:00			1	Wed 1/6/10	7:43 AM

Answered	1:00	NET NET SRVC	(716) 250-4800	Mon 1/4/10	11:24 AM
Answered	1:00			Mon 1/4/10	10:15 AM
Answered	1:00			Mon 1/4/10	9:45 AM
Answered	1:00			Mon 1/4/10	9:14 AM
Answered	1:00			Mon 1/4/10	8:21 AM
Missed				Sun 1/3/10	6:08 PM
Answered	1:00			Sun 1/3/10	6:07 PM
Answered	3:00			Sun 1/3/10	6:06 PM
Answered	1:00	Unknown		Sun 1/3/10	6:06 PM
Answered	11:00			Sun 1/3/10	12:50 PM
Answered	1:00			Sun 1/3/10	11:24 AM
Answered	2:00			Sun 1/3/10	10:21 AM
Answered	1:00	Unknown		Sun 1/3/10	10:11 AM
Answered	4:00			Sun 1/3/10	9:48 AM
Answered	32:00			Sat 1/2/10	11:27 PM
Answered	19:00			Sat 1/2/10	10:57 PM

Answered	1:00				Thu 12/31/09	7:47 PM
Answered	1:00				Thu 12/31/09	5:49 PM
Answered	14:00				Thu 12/31/09	4:24 PM
Answered	1:00				Thu 12/31/09	3:41 PM
Answered	1:00				Thu 12/31/09	11:50 AM
Answered	1:00	Unknown			Thu 12/31/09	11:22 AM
Answered	1:00	NET NET SRVC	(716) 250-4800		Thu 12/31/09	11:21 AM
Answered	1:00	NET NET SRVC	(716) 250-4800		Thu 12/31/09	11:17 AM
Answered	2:00				Thu 12/31/09	11:03 AM
Answered	1:00				Thu 12/31/09	10:28 AM
Answered	1:00	NET NET SRVC	(716) 250-4800		Thu 12/31/09	9:44 AM
Answered	1:00	NET NET SRVC	(716) 250-4800		Thu 12/31/09	8:44 AM
Answered	1:00				Wed 12/30/09	7:30 PM
Answered	1:00				Wed 12/30/09	7:27 PM
Answered	1:00				Wed 12/30/09	7:19 PM
Answered	1:00				Wed 12/30/09	7:18 PM
Answered	1:00				Wed 12/30/09	6:53 PM
Answered	1:00	NET NET SRVC	(716) 250-4800		Wed 12/30/09	5:47 PM
Answered	2:00				Wed 12/30/09	5:10 PM
Answered	1:00	Unknown			Wed 12/30/09	4:52 PM
Answered	2:00				Wed 12/30/09	4:41 PM

Answered	1:00	NET NET SRVC	(716) 250-4800	Wed 12/30/09	4:11 PM
Answered	1:00			Wed 12/30/09	3:28 PM
Answered	1:00			Wed 12/30/09	3:08 PM
Answered	1:00			Wed 12/30/09	12:44 PM
Answered	1:00	NET NET SRVC	(716) 250-4800	Wed 12/30/09	9:15 AM
Answered	4:00			Wed 12/30/09	7:59 AM
Missed				Tue 12/29/09	6:55 PM
Answered	1:00			Tue 12/29/09	4:12 PM
Answered	2:00			Tue 12/29/09	2:44 PM
Answered	2:00			Tue 12/29/09	2:35 PM
Answered	1:00	NET NET SRVC	(716) 250-4800	Tue 12/29/09	11:51 AM
Answered	4:00			Tue 12/29/09	7:43 AM
Answered	1:00			Tue 12/29/09	7:35 AM
Answered	1:00			Tue 12/29/09	7:27 AM
Answered	1:00	NET NET SRVC	(716) 250-4800	Mon 12/28/09	8:11 PM

Answered 1:00

NET NET SRVC

(716) 250-4800

Tue 12/22/09 4:06 PM

Redline Recovery Services, LLC
95 John Muir Dr.
Amherst NY 14228-1144
1-716-250-4800

Date: October 6, 2009

JEFFREY C MANSFIELD
234 MARSHALL ST
PERKASIE PA 18944-1441

Current Creditor: FIA CARD SERVICES, N.A.
Balance: \$14,325.35
Reference: 4888920011492475
Account ID: B3106783

Dear Jeffrey C Mansfield:

Your account is seriously past due and FIA CARD SERVICES, N.A. has authorized us to initiate collection efforts to recover the Balance identified above. Please be advised that FIA CARD SERVICES, N.A. has designated our collection efforts as the last step in their collection process prior to forwarding your account to their lawyers to review for potential litigation or arbitration as provided for in your card holder agreement.

No one has yet submitted the necessary paperwork to file a litigation or arbitration claim against you. No attorney has reviewed this account, however, if you continue to neglect your obligation very much longer FIA CARD SERVICES, N.A. intends to send your account to a collection law firm.

We take pride in assisting our customers to resolve their situations. If you have any questions or wish to discuss your account with one of our representatives, please call our toll free number at 1-866-388-4208 during normal business hours. (Monday - Thursday 8:00AM - 9:00PM EST; Friday 8:00AM - 4:30PM EST; Saturday 9:00AM - 12:00PM EST)

As of the date of this letter, you owe \$14,325.35. Because of interest, late charges, and other charges that may vary from day to day, the amount due on the day you pay may be greater. Hence if you pay the amount shown above, an adjustment may be necessary after we receive your payment. If an adjustment is made, we may attempt to contact you again about the adjustment. For further information, write the undersigned or call 1-866-388-4208

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor.

You can pay this account by visiting our website, www.redlinepayment.com, by calling us and paying by phone, or make payment by mail, enclosing the bottom portion of this letter. Please send your payment or correspondence to the processing center listed below. Please include your Account ID, B3106783, with all payments and correspondence.

PAYMENT PROCESSING CENTER
11675 RAINWATER DR STE 350
ALPHARETTA GA 30009-8693

Or visit our web page at www.redlinepayment.com

This is an attempt to collect a debt and any information obtained will be used for that purpose. This is a communication from a debt collector.

PLEASE DETACH HERE AND RETURN WITH YOUR PAYMENT IN THE ENVELOPE PROVIDED

PO Box 177
Sanborn, NY 14132-0177



Account ID: B3106783
Date: October 6, 2009

If paying by Credit Card, please complete this section			
<input type="checkbox"/> VISA	CARD NUMBER	AMOUNT	CVV # (3 or 4 Digits on Back of Card)
<input type="checkbox"/> M/C	SIGNATURE	EXP. DATE	
CARDHOLDER NAME (Please Print)		<input type="checkbox"/> Check Here if Cardholder Address is The Same (If Not, Provide Cardholder Address On Back of Statement)	

PL041 5101

*A-02-ECA-AM-00328



JEFFREY C MANSFIELD
234 MARSHALL ST
PERKASIE PA 18944-1441



Current Creditor: FIA CARD SERVICES, N.A.
Balance: \$14,325.35
Reference: 4888920011492475

**PAY THIS
AMOUNT \$14,325.35**

Payment Processing Center

REDLINE RECOVERY SERVICES, LLC.
11675 RAINWATER DR STE 350
ALPHARETTA GA 30009-8693



Date: October 26, 2009

Redline Recovery **STATEMENT****Account Summary**

AMY L AND JEFFREY C MANSFIELD
234 MARSHALL ST
PERKASIE PA 18944-1441

Current Creditor: FIA CARD SERVICES, N.A.
Reference: 4888920011492475
Account ID: B3106783
Balance: \$14,325.35


Dear Amy L and Jeffrey C Mansfield:

Per our agreement, your check (or credit card payment) in the amount of \$2,158.00 will be deposited (or processed) on 10/31/2009. Please ensure that funds are available so that your payment is not rejected.

This is an attempt to collect a debt and any information obtained will be used for that purpose. This is a communication from a debt collector.

PLEASE RESPOND

 TELEPHONE: 1-866-388-4208

 Pay online by check or credit card at www.redlinepayment.com.

 Please include your Account ID, B3106783, with all payments and correspondence sent to:
REDLINE RECOVERY SERVICES, LLC., 11675 RAINWATER DR STE 350, ALPHARETTA GA 30009-8693

 Office Hours: Mon. - Thur. 8:00AM - 9:00PM EST; Fri. 8:00AM - 4:30PM EST; Sat. 9:00AM - 12:00PM EST

pd 2158.00 -
10/31

pd 2200.00 -
11/30

4300.00

8600.00

3000

PO Box 177
Sanborn, NY 14132-0177



Date: October 26, 2009

If paying by Credit Card, please complete this section			
<input type="checkbox"/> VISA	CARD NUMBER	AMOUNT	CVV # (3 or 4 Digit code on Back of Card)
<input type="checkbox"/> MASTERCARD	SIGNATURE	EXP. DATE	
CARDHOLDER NAME (Please Print)		<input type="checkbox"/> Check Photo ID Cardholder Address is The Same (Ngl. Provide Cardholder Address On Back of Statement)	

PD05 8101

*A-03-OKN-AM-00098



AMY L AND JEFFREY C MANSFIELD
234 MARSHALL ST
PERKASIE PA 18944-1441

**STATEMENT****Account Summary**

Current Creditor: FIA CARD SERVICES, N.A.
Reference: 4888920011492475
Account ID: B3106783
Balance: \$14,325.35

offered 8600.
4300
Settlement
14300



Date: 1/8/2010

Agency: Redline Recovery

Address: PO BOX 177, Scarsboro NY 14132-0177

Account No.: B3106783

To Whom It May Concern:

I have received numerous harassing, rude, and abusive phone calls. The callers have been threatening to me or my family members. I have learned that these calls are in violation of state of the state of Pennsylvania and federal telephone harassment laws, including Section 223 of Title 47 of the United States Code.

It is actually a criminal as well as civil offense to make repeated harassing calls to me at home or work. I realize that my creditors have the right to contact me to inquire about the status of my account, but they must do so in a decent and civilized manner. This does not apply to friends or family members. You may no longer contact my relatives, friends, or anyone at my place of employment. Please remove any contact information you have in your databases regarding these people at once.

I have learned about the difference between a "collector" and a "creditor." Creditors have the right to call and inquire, they do not have the right to harass and abuse. And they do not have the right to contact my place of employment, family, or friends now that I am specifically stating this in writing. The fact that you start with a business purpose does not protect you from telephone harassment laws if you do not conduct yourself in a professional manner.

Since I have already told you that I do not have the means to pay all of my obligations, it is abusive for you to call me repeatedly. If I started the day without the money to pay whatever may be due to the bank, it's not likely I'm going to have it by mid-afternoon. And if you called me twice yesterday, you know that I won't have the money today. You are simply harassing me.

Enough is enough. Do not call me more than once a week. Do not call my friends, family or my place of employment. I am keeping a log of your calls. If you continue to annoy, abuse, and harass me I will report you to the authorities, including the Office of the Comptroller of Currency, the Federal Reserve Board, and the State Attorney General.

Sincerely,

Jeff and Amy Mansfield

* Please forward all calls to

800-777-1291

